Remarks

Reconsideration and withdrawal of the objections and rejections set forth in the above-mentioned Official Action in view of the foregoing amendments and the following remarks are respectfully requested.

Claims 1-37 are now pending in the application, with Claims 1, 11, 17 and 27 being independent. Claims 1-37 have been amended herein and Claim 38 has been cancelled without prejudice or disclaimer.

Initially, Applicant respectfully requests that the Examiner acknowledge receipt of the certified copy of the priority document. The certified copy of French Patent Application No. 0301941 was filed with the original application papers on February 9, 2004. A copy of the postcard stamped by the Patent and Trademark Office acknowledging receipt of that certified copy is attached.

The drawings were objected to because the Examiner suggested that the various blocks in Figure 1 need descriptive labels and because reference numeral 113 in Figure 2 is not mentioned in the specification. In response, Applicant is submitting herewith replacement drawing sheets in which descriptive labels have been included in Figure 1 and reference numeral 113 in Figure 2 has been changed to 3. Favorable consideration and withdrawal of the objections to the drawings are requested.

The disclosure was objected to for including embedded hyperlinks and/or another form of browser-executable code at pages 1 and 6. The specification has been amended at these pages to eliminate the hyperlinks. Favorable consideration and withdrawal of the objection to the disclosure are requested.

Claim 36 was objected to for a minor informality. In response, "for" has been changed --or-- in line 2 as requested by the Examiner. Favorable consideration is requested.

Claims 37 and 38 were rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Without conceding the propriety of this rejection, Claim 38 has been cancelled without prejudice or disclaimer. Claim 37, however, cannot be said to be directed to "programs per se." Rather, Claim 37 is directed to an information storage means readable by a computer or microprocessor. Such terminology has been deemed to be acceptable by the Patent and Trademark Office. Reconsideration and withdrawal of the § 101 rejection are requested.

Claim 35 was rejected under 35 U.S.C. § 112, first paragraph, as allegedly not being enabled by the description. Without conceding the propriety of this rejection, Claim 35 has been amended to eliminate reference to a "single means." Reconsideration and withdrawal of the § 112, first paragraph, rejection are requested.

Claim 37 was rejected under 35 U.S.C. § 112, second paragraph, as allegedly being incomplete for omitting essential elements. It is respectfully submitted, however, that in an information storage means that stores a program, there is no need for any elements to cause a microprocessor to perform a method. Such claims are commonly used in U.S. patent practice. Reconsideration and withdrawal of the § 112 rejection of Claim 37 are requested.

Claims 5, 8, 13-15, 12, 24, 29-31 and 35-37 were rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. Without conceding the propriety of

this rejection, Applicant has reworded the language questioned by the Examiner. Reconsideration and withdrawal of the § 112, second paragraph, rejection are also requested.

Claims 1-3, 6, 7, 10-14, 16-19, 22, 23, 26-30 and 32-38 were rejected under 35 U.S.C. § 102 as being anticipated by the article "Polymap: A Versatile Client-Side Image Map for the Web" (Ang et al.). Claims 1-4, 6, 7, 9-20, 22, 23 and 25-38 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0105531 (Niemi). Claims 5, 8, 21 and 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ang et al. Claims 5, 8, 21 and 24 were also rejected under 35 U.S.C. § 103(a) as being unpatentable over Niemi. These rejections are respectfully traversed.

Support the amendments to the independent claims can be found in the specification at least at page 11, lines 14 to 21 and 13, lines 30 to 32. Of course, the claims are not intended to be limited in scope to these preferred embodiments.

With the arrangements and methods of the present invention, management functions for navigation in the image can be stored in the file that also contains the characteristics of the zoomable area and need not be stored at the client terminal, as had been done previously. This can provide more flexibility for management functions to be associated with the zoomable areas as the client terminal need not be configured to perform the management function (i.e., need not contain the necessary software to perform this function) in advance, as described in Applicant's specification at page 2, line 31 to page 3, line 4.

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Ang et al. is directed to image mapping techniques and proposes a Polymap solution. However, unlike the present invention, in the Polymap solution there is no such management function in a computer-executable language in the files describing the zoomable area. The navigation information identified in the Office Action at page 9 is only data and cannot be considered to be a management function in a computer-executable language for navigation in the image, as is recited in independent Claims 1 and 17. In addition, it cannot be considered that the information read in the Polymap file is executed (as "executing data" has no meaning) and Ang et al., therefore, fails to disclose or suggest execution of at least one management function, with the management function being read in a computer-executable language for navigation in the image, in a first file from which characteristics of at least one zoomable area are read, as is recited in independent Claims 11 and 27.

Accordingly, Ang et al. fails to disclose or suggest important features of the present invention recited in the independent claims.

Niemi is also not believed to disclose or suggest the features discussed above as being deficient in Ang et al. Niemi is directed to a method for zooming. However, Applicant submits that the presentation image to be loaded to the display device only contains data such as the corner coordinates of the zoomable area but no management function in a computer-executable language. In fact, Applicant submits that Niemi even teaches away from adding any other information than the necessary data. Note paragraphs [0007] to [0009].

Accordingly, <u>Niemi</u> fails to disclose or suggest writing, in a file in which characteristics of at least one zoomable area are written, at least one management function in a computer-executable language for navigation in the image, as is recited in independent Claims 1 and 17. Nor does <u>Niemi</u> disclose or suggest reading at least one management function in a computer-executable language, in a file from which characteristics of at least one zoomable area are read, which management function is for navigation in the image, as is recited in independent Claims 11 and 27.

Accordingly, <u>Niemi</u> also fails to disclose or suggest important features of the present invention recited in the independent claims.

Thus, independent Claims 1, 11, 17 and 27 are patentable over the citations of record. Reconsideration and withdrawal of the §§ 102 and 103 rejections are respectfully requested.

For the foregoing reasons, Applicant respectfully submits that the present invention is patentably defined by independent Claims 1, 11, 17 and 27. Dependent Claims 2-10, 12-16, 18-26 and 28-37 are also allowable, in their own right, for defining features of the present invention in addition to those recited in their respective independent claims. Individual consideration of the dependent claims is requested.

Applicant submits that the present application is in condition for allowance. Favorable reconsideration, withdrawal of the objections and rejections set forth in the above-noted Office Action, and an early Notice of Allowability are requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.
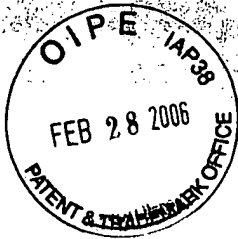
Respectfully submitted,

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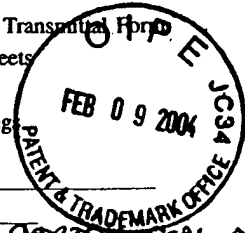Mo. Day Yr.

Atty. Docket 01807.01404

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Kindly acknowledge receipt of the accompanying:

☒ Specifications, claims and abstract _27_ pages, with Transmittal Form.
☒ Patent Application Bibliographic Data Sheet _2_ sheets.
☐ Executed Oath or Declaration and Power of Attorney
☒ _5_ Sheets of _✓_ formal _____ informal drawing.
☒ Check for $ _1542.00_ (filing fee)
☐ Request for Continued Examination and Check for $ _____
☐ Assignment, PTO-1595 and Check for $ _____
☐ Transmittal Under 37 CFR 1.53(d) (CPA)
☐ Petition under 37 CFR 1.136 and check for $ _____
☒ Other (specify) _Information Disclosure Statement + 3 Refs_

Certified Copy of
FR 0301541 Priority Doc

by placing your receiving date stamp hereon and mailing or returning to deliverer.

This is a ☐ Continuation ☐ Divisional ☐ Continuation-In-Part
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37 CFR 1.8 ☐
37 CFR 1.10 ☐
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